

IN THE UNITED STATES BANKRUPTCY COURT
District of Puerto Rico

In the Matter of:

ANGEL LUIS GALARZA RODRIGUEZ

Debtor(s)

Case No. **11-05865 MC**

Chapter 13

**REQUEST TO OPPOSE DISMISSAL AND SCHEDULE NEW MEETING OF
CREDITORS**

TO THE HONORABLE COURT:

The undersigned, attorney for the above-named debtors, notifies the Court as follows,

1. Debtor failed to appear to the meeting of creditors because he explained that he had problems receiving the mail and did not received neither our letters or those from the court. However he already took arranged the problem with his mailbox identification and he is now receiving his mail normally at the address specified in the petition.
2. The day of the meeting we called him from outside the meeting room and he was still working near Vega Baja and there was not time to wait for him. We explained that to the presiding officer and she informed that we should file an explanatory motion. We waited to do so until there was evidence that debtor commenced making payments to the plan as he already has done.
3. Failure to appear was caused by a circumstance that apparently was not in control of debtor and he is requesting to be excused and that a new 341 meeting of creditors be scheduled.

WHEREFORE, we request from this Honorable Court to take notice of the informed above, deny motion to dismiss filed by the trustee and grant a continuance of the meeting of creditors and confirmation hearing..

I HEREBY CERTIFY, to have filed with the Clerk of the Court the present motion using the ECF system that will send copy of this motion to the Trustee and all other participants. In Vega

Baja, Puerto Rico, on this September 16, 2011.

s/ JUAN O. CALDERON LITHGOW
JUAN O. CALDERON LITHGOW
ATTORNEY FOR DEBTOR, 205607
PO BOX 1710
VEGA BAJA, PR 00694-1710

TEL.: 858-5476

E-mail: juan004@prtc.net